IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,)
ILLINOIS PENSION FUND AND)
BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,	No. 07 C 6874
ILLINOIS WELFARE FUND,)
) Judge Lefkow
Plaintiffs,)
) Magistrate Judge Cole
v.)
)
RNR Leasing, Inc., R and R Leasing, Inc.,)
and Royanne Reddy, Individually,)
· · · · · · · · · · · · · · · · · · ·)
Defendants.)

MOTION FOR TURNOVER ORDER

Plaintiffs, pursuant to the provisions of Rules 69(a) of the Federal Rules of Civil Procedure, and 735 ILCS, Section 2-1402(c)(3) move this Court to enter a Turnover Order against the Defendants, RNR Leasing, Inc., R and R Leasing, Inc., and Royanne Reddy, Individually. In support of their Motion, Plaintiffs state as follows:

- 1. This Court entered judgment for Plaintiff and against Defendant on March 4, 2008 in the amount of \$8,047.87, for the BOARD OF TRUSTEES OF THE LOCAL UNION NO. 422 U.A. OF JOLIET ILLINOIS PENSION FUND, et. al..
 - 2. Plaintiffs issued a citation on Marseilles Bank on April 1, 2008.
- 3. In response to the citation, Marseilles Bank stated to counsel for Plaintiffs on April 15, 2008 that Marseilles Bank is currently holding \$8,047.87 owed to Plaintiff. (Exhibit A)
- 4. Pursuant to Rule 69(a), proceedings supplementary to a judgment shall follow the practice and procedure of the State.
- 5. Pursuant to 735 ILCS Section 2-1402(c)(3), turnover may be sought from the person cited upon its Answer.

6. Plaintiffs seek an Order requiring Marseilles Bank to turn over to Plaintiffs the value of the amount, which is owed to the defendant, \$8,047.87.

WHEREFORE, Plaintiffs, pursuant to the provisions of Rules 69(a) of the Federal Rules of Civil Procedure, and 735 ILCS, Section 2-1402(c)(3), move this Court to enter a Turnover Order against Marseilles Bank in the amount of \$8,047.87 in satisfaction of the outstanding judgment and satisfaction of the citation.

BOARD OF TRUSTEES OF THE LOCAL UNION NO. 422, U.A. OF JOLIET, ILLINOIS PENSION FUND, et. al.

s/ Donald D. Schwartz
One of their Attorneys

Donald D. Schwartz **ARNOLD AND KADJAN**19 W. Jackson Boulevard
Chicago, IL 60604
(312) 236-0415